

SEIDEN | LAW

July 10, 2023

VIA ECF

The Honorable Jose R. Almonte
United States District Court
District of New Jersey
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

Re: *Guo v. Lor*, No. 2:20-cv-05099-JMV-JRA

Dear Judge Almonte,

We represent defendant (and counterclaim Plaintiff) Stewart Lor (“Mr. Lor”) in the above-captioned matter. With the plaintiffs’ counsel’s consent, we write jointly regarding the Court’s text order issued on July 10, 2023 (“July 10 Order”).

The Court’s July 10 Order directed the parties’ senior attorneys in charge of this case and clients with full settlement authority to attend an in-person final pretrial conference scheduled for August 24, 2023 (“Pretrial Conference”).

On July 10, 2023, the parties’ counsel conducted an extensive meet and confer to discuss the Final Pretrial Order and the upcoming Pretrial Conference. During the call, the parties’ counsel realized that all parties, *i.e.*, Mr. Lor, Mr. Xin Yue Guo (a/k/a Xin Yue), and Yisheng Li, are currently residing in the People’s Republic of China (“PRC”). In consideration of the amount at dispute in this action, requesting the parties to travel from the PRC to the United States for the Pretrial Conference would place an onerous burden on them. In addition, most of the parties are Chinese Nationals for whom to enter the United States they would need to apply for a visa, schedule an interview with a consulate official, in some instances would need to go through a second round interview, before obtaining, if approved, a visa for entry to the United States. Such approval might not arrive in time for the conference, if at all. Therefore, the parties jointly seek the Court’s relief to permit the parties to attend the Court’s Pretrial Conference remotely or telephonically.

Please do not hesitate to contact me via email or telephone if your Honor has any questions.

Respectfully Submitted,

cc: All counsel of record (via ECF)

/s/ Xintong Zhang
Xintong Zhang